

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

Chapter 11

THE CONNAUGHT GROUP, LTD., et al.,¹

Case No. 12-10512 (SMB)

Debtors,

(Jointly Administered)

-----X
**MARTINA SCHUMAN on behalf of herself and
all others similarly situated,**

Plaintiff,

Adv. Case No. 12-01051 (SMB)

v.

THE CONNAUGHT GROUP, LTD.

Defendant.
-----X

STIPULATION AND SCHEDULING ORDER

WHEREAS, counsel for Martina Schuman (the “Plaintiff”) and The Connaught Group, Ltd. (the “Defendant”) conferred to develop a proposed scheduling order for this matter;

WHEREAS, on July 26, 2012, the Court held a pre-trial status conference in this matter;

IT IS HEREBY ORDERED AS FOLLOWS:

1. Initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) shall be made no later than September 7, 2012.
2. Any motion to certify a class (“Class Motion”) shall be filed on or before October 12, 2012, any responses to the Class Motion shall be filed on or before November 2, 2012, and any reply in support of the Class Motion shall be filed on November 14, 2012.
3. All fact discovery shall be completed no later than March 1, 2013.

¹ The Debtors, together with the last four digits of each Debtor’s federal tax identification number are: The Connaught Group, Ltd. (8384); Limited Editions for Her of Nevada LLC (7669); Limited Editions for Her of Branson LLC (8078); Limited Editions for Her LLC (2197); and WDR Retail Corp. (8865).

4. The parties, shall, pursuant to Federal Rule of Civil Procedure 26(a)(2), designate expert witnesses regarding issues upon which they bear the burden of proof and make corresponding disclosures by March 22, 2013.

5. The designation of rebuttal experts, if any, and the service of rebuttal expert reports shall occur by April 19, 2013.

6. Expert reports, rebuttal or otherwise, shall provide the information required by Federal Rule of Civil Procedure 26(a)(2)(B).

7. The deadline to conclude all depositions of expert witnesses is May 10, 2013.

8. Unless resolved, this proceeding shall be referred to mediation pursuant to General Order M-390. By May 24, 2013, counsel must advise the Court in writing of the identity of the mediator or that they have been unable to agree on the selection of a mediator. Mediation shall be completed by July 26, 2013. If this proceeding remains unresolved following mediation, the parties shall schedule a final pre-trial conference with the Court no later than August 16, 2013.

9. If any party desires to file a motion that would be dispositive of part or all of the claims in this proceeding, such party must notify the Court and the other party of that intention no later than March 15, 2013 and request a pre-motion conference with the Court prior to filing any such motion.

10. The deadlines contained in this Scheduling Order may be extended only by the Court and only upon written motion for good cause shown. Failure to comply with the deadlines set forth in this Order may result in sanction, including but not limited to entry of judgment against the non-complying party.

STIPULATED AND AGREED

Dated: July 26, 2012

Dated: July 26, 2012

/s/ Jack A. Raisner

Jack A. Raisner
René S. Roupinian

/s/ David L. Barrack

David L. Barrack
Neil G. Sparber
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SO ORDERED by the Court this 26th day of July, 2012.

/s/ STUART M. BERNSTEIN
HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE